

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MICROSOFT CORPORATION, a Washington corporation,

CASE NO. C10-1823-JLR

DEFENDANTS' NONOPPOSITION TO  
MICROSOFT'S 6/15/12 MOTION TO  
FILE DOCUMENTS UNDER SEAL

**NOTED ON MOTION CALENDAR:  
Friday, June 29, 2012**

MOTOROLA, INC., and MOTOROLA  
MOBILITY, INC., and GENERAL  
INSTRUMENT CORPORATION,

## Defendants.

MOTOROLA MOBILITY, INC., and  
GENERAL INSTRUMENT CORPORATION,

**Plaintiffs/Counterclaim Defendant,**

V.

MICROSOFT CORPORATION.

Defendant/Counterclaim Plaintiff.

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S  
6/15/12 MOTION TO FILE DOCUMENTS UNDER SEAL  
CASE NO. C10-1823-JLR

SUMMIT LAW GROUP PLLC  
315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

1 Defendants do not oppose Microsoft's 06/15/12 Motion to Seal (ECF No. 342) regarding  
2 Exhibit 1 to Chris Wion's June 15, 2012 letter to the Court requesting leave to supplement the  
3 record, in support of Microsoft's Motion for Partial Summary Judgment Dismissing Motorola's  
4 Claim for Injunctive Relief (ECF No. 141). Exhibit 1 to Chris Wion's June 15, 2012 letter to the  
5 Court consists of a letter sent by counsel to Microsoft to counsel for Google, Inc., on June 15,  
6 2012 (the "Cramer Letter") and (attached to that letter as Exhibit A) a confidential license  
7 agreement between Google (Motorola Mobility, Inc. and General Instrument Corp.'s parent  
8 company) and MPEG LA, L.L.C., a non-party to this litigation. MPEG LA has designated this  
9 license agreement as containing confidential information under the terms of the Protective Order  
10 entered on July 21, 2011 (ECF No. 72). Disclosure of this information to third parties and other  
11 party employees not covered by the Protective Order would have the potential to lead to  
12 competitive harm. Due to presence of this highly confidential information throughout the license,  
13 and the Cramer Letter's repeated references to the license, Exhibit 1 should be sealed in its  
14 entirety.

15 Nothing herein is intended as a waiver of Defendants' right to contest Microsoft's  
16 designation of material as Confidential Business Information in accordance with the terms of the  
17 Protective Order. Defendants expressly reserve the right to do so as the circumstances warrant.

18 DATED this 27th day of June, 2012.

19 SUMMIT LAW GROUP PLLC

20 By /s/ Ralph H. Palumbo

21 Ralph H. Palumbo, WSBA #04751

22 Philip S. McCune, WSBA #21081

23 Lynn M. Engel, WSBA #21934

24 *ralphp@summitlaw.com*

25 *philm@summitlaw.com*

26 *lynne@summitlaw.com*

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S  
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4836-5784-5264.1

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315 FIFTH AVENUE SOUTH, SUITE 1000  
SEATTLE, WASHINGTON 98104-2682  
Telephone: (206) 676-7000  
Fax: (206) 676-7001

By /s/ K. McNeill Taylor, Jr.  
K. McNeill Taylor, Jr.  
MOTOROLA MOBILITY, INC.  
MD W4-150  
600 North U.S. Highway 45  
Libertyville, IL 60048-1286  
Phone: 858-404-3580  
Fax: 847-523-0727

And by

Steven Pepe (*pro hac vice*)  
Jesse J. Jenner (*pro hac vice*)  
Kevin J. Post (*pro hac vice*)  
Stuart W. Yothers (*pro hac vice*)  
Ropes & Gray LLP  
1211 Avenue of the Americas  
New York, NY 10036-8704  
(212) 596-9000  
*steven.pepe@ropesgray.com*  
*jesse.jenner@ropesgray.com*  
*kevin.post@ropesgray.com*  
*stuart.yothers@ropesgray.com*

Norman H. Beamer (*pro hac vice*)  
Gabrielle E. Higgins (*pro hac vice*)  
Ropes & Gray LLP  
1900 University Avenue, 6<sup>th</sup> Floor  
East Palo Alto, CA 94303-2284  
(650) 617-4000  
*norman.beamer@ropesgray.com*  
*gabrielle.higgins@ropesgray.com*

Paul M. Schoenhard (*pro hac vice*)  
Amanda F. Wieker (*pro hac vice*)  
Ropes & Gray LLP  
One Metro Center  
700 12<sup>th</sup> Street NW, Suite 900  
Washington, DC 20005-3948  
(202) 508-4600  
*paul.schoenhard@ropesgray.com*  
*amanda.wieker@ropesgray.com*

*Attorneys for Motorola Solutions, Inc., Motorola Mobility, Inc., and General Instrument Corporation*

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S  
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Fax: (206) 676-7001

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Arthur W. Harrigan, Jr., Esq.  
Christopher T. Wion, Esq.  
Shane P. Cramer, Esq.  
Danielson, Harrigan, Leyh & Tollefson LLP  
*arthurh@dhlt.com*  
*chrisw@dhlt.com*  
*shanec@dhlt.com*

Brian R. Nester, Esq.  
David T. Pritikin, Esq.  
Douglas I. Lewis, Esq.  
John W. McBride, Esq.  
Richard A. Cederoth, Esq.  
David Greenfield, Esq.  
William H. Baumgartner, Jr., Esq.  
David C. Giardina, Esq.  
Carter G. Phillips, Esq.  
Constantine L. Trela, Jr., Esq.  
Ellen S. Robbins, Esq.  
Nathaniel C. Love, Esq.  
Sidley Austin LLP  
*bnester@sidley.com*  
*dpritikin@sidley.com*  
*dilewis@sidley.com*  
*jwmcbride@sidley.com*  
*rcederoth@sidley.com*  
*david.greenfield@sidley.com*  
*wbaumgartner@sidley.com*  
*dgiardina@sidley.com*  
*cphillips@sidley.com*  
*ctrela@sidley.com*  
*erobbins@sidley.com*  
*nlove@sidley.com*

T. Andrew Culbert, Esq.  
David E. Killough, Esq.  
Microsoft Corp.  
*andycu@microsoft.com*  
*davkill@microsoft.com*

DATED this 27th day of June, 2012.

/s/ *Marcia A. Ripley*

Marcia A. Ripley

DEFENDANTS' NONOPPOSITION TO MICROSOFT'S  
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